

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CR. NO.: 2:24-cr-20145-JTF-tmp

18 U.S.C. § 1028A

18 U.S.C. § 1341

**LISA JEANINE FINDLEY,
a/k/a LISA HOLDEN,
a/k/a LISA HOWELL,
a/k/a GREGORY NAUSSANY,
a/k/a KURT NAUSSANY,
a/k/a LISA JEANINE SULLINS,
a/k/a CAROLYN WILLIAMS,**

FILED UNDER SEAL

MOTION TO SEAL COMPLAINT

Comes now the United States of America, by and through Kevin G. Ritz, United States Attorney for the Western District of Tennessee, and Carroll L. Andre, Assistant United States Attorney, and would respectfully move this Honorable Court to seal the Complaint in this case. In support of this motion, the Government states the following:

1. The investigation is ongoing; and
2. The defendant may flee, conceal evidence or seek to influence persons cooperating with the investigation if they learn of the investigation's existence.

Based on the foregoing, the United States respectfully requests that the complaint be sealed.

WHEREFORE, counsel for the United States respectfully moves this Honorable Court to seal the complaint and order that remain sealed until the arrest of the defendant.

Respectfully submitted,

Kevin G. Ritz
United States Attorney

By: s/ Carroll L. Andre
Carroll L. Andre
Assistant United States Attorney
167 N. Main, Suite 800
Memphis, TN 38103
(901)544-4231

CERTIFICATE OF SERVICE

I, Carroll L. Andre, Assistant United States Attorney for the Western District of Tennessee, hereby certify that a copy of the foregoing motion was electronically filed, hand delivered, and/or mailed, first class postage prepaid to the Court.

This 15th day of August 2024.

By: s/ Carroll L. Andre
Carroll L. Andre
Assistant United States Attorney